

UNITED STATES BANKRUPTCY COURT

FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

In the Matter of:

MARK ANTHONY ANDERSON

Debtor

Chapter 13

Case No. 19-10888-KHK

OBJECTION TO CONFIRMATION OF MODIFIED PLAN,
NOTICE OF OBJECTION TO CONFIRMATION OF MODIFIED PLAN
AND
NOTICE OF SCHEDULED HEARING ON THIS OBJECTION

Thomas P. Gorman, Chapter 13 Trustee, has filed this objection to confirmation of your Modified Chapter 13 Plan filed December 10, 2019. The cause for this objection is as follows:

Violation of 11 U.S.C. §1325(b)(1)(B) – Disposable Income.

- Prior Schedule I noted a potential increase in income that has now been removed and which has not been factored into the Plan.

Violation of 11 U.S.C. §1325(a)(6) – Feasibility.

- 0% Plan is underfunded as follows:

PERFORMANCE:	Amount of Plan Payment	420.00 x 6	= 2,520.00	
		1,385.00 x 24	= 33,240.00	
		1,495.00 x 30	= 44,850.00	
	Number of Months	60		
		0.00		0.00
	Total Receipts			80,610.00
	Disbursements Required:			
	Attorney	2,500.00		
	Taxes-Other Priority	0.00		
	Secured	71,415.06		
	Unsecured	0.00		0% of \$11,495.02
	Other			
	Trustee	7,391.51		10%
	Total Disbursement			81,306.57

Notice of Objection To Confirmation

Mark Anthony Anderson, Case # 19-10888-KHK

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the court to grant the relief sought in the objection, or if you want the court to consider your views on the objection, then on or before five business days prior to the hearing date, you or your attorney must:

File with the court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above. You must mail a copy to the persons listed below.

Attend the hearing to be held on January 16, 2020 at 1:30 p.m., in Courtroom III on the 3rd floor, United States Bankruptcy Court, 200 South Washington Street, Alexandria, VA 22314. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

A copy of any written response must be mailed to the following persons:

Thomas P. Gorman
300 North Washington Street, Ste, 400
Alexandria, VA 22314

Clerk of the Court
United States Bankruptcy Court
200 South Washington Street
Alexandria, VA 22314

If you or your attorney do not take steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: January 3, 2020

/s/Thomas P. Gorman
Thomas P. Gorman
Chapter 13 Trustee
300 N. Washington Street, #400
Alexandria, VA 22314
(703) 836-2226
VSB 26421

Notice of Objection To Confirmation

Mark Anthony Anderson, Case # 19-10888-KHK

CERTIFICATE OF SERVICE

I hereby certify that I have this 3rd day of January, 2020 served via ECF to authorized users or mailed a true copy of the foregoing Objection to Confirmation, Notice of Objection and Notice of Hearing to the following parties.

Mark Anthony Anderson
Chapter 13 Debtor
1411 Admiral Drive
Woodbridge, VA 22192

Nathan Fisher, Esq.
Attorney for Debtor
Fisher-Sandler, LLC.
3977 Chain Bridge Rd. #2
Fairfax, VA 22030

____/s/ Thomas P. Gorman_____
Thomas P. Gorman